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9 Attorneys for Defendant
JASON EDWARD THOMAS CARDIFF
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11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
13

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 JASON EDWARD THOMAS
18 CARDIFF,

19 Defendant.
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Case No. 5:23-cr-00021-JGB

**JASON CARDIFF'S *EX PARTE*
APPLICATION FOR AN ORDER
PERMITTING INTERNATIONAL
TRAVEL AND RETURNING HIS
PASSPORT**

*[Filed concurrently with Declaration of
Stephen R. Cochell and [Proposed]
Order]*

EX PARTE APPLICATION

Jason Cardiff has requested that counsel file this *ex parte* application seeking permission to travel to Ireland from September 9th, 2024 to September 25th, 2024, and for the return of his passport to permit that travel.

Mr. Cardiff has been released on a \$530,000 appearance bond, justified in the amount of \$500,000 with full deeding of real property. His release conditions include, among other conditions: a travel restriction to the Central District of California and the Southern District of Texas; a curfew between the hours of 8:00 p.m. and 8:00 a.m.; and placement in the custody of third-party custodian, Attorney Stephen Cochell. Lilia Murphy and Brian Kennedy executed affidavits of sureties in support of the bond. Ms. Murphy also deeded her home as collateral.

Mr. Cardiff is living with Attorney Cochell in Kingwood, Texas, and he is being supervised by United States Probation Officer Jack Sherrod of the Southern District of Texas.

Mr. Cardiff respectfully requests the Court's permission to travel to Ireland. This request is made to allow Mr. Cardiff to assist his wife, Eunjung Cardiff, with her ongoing medical needs during the time period and assist with their small child. Mr. Cardiff also has scheduled necessary medical appointments for himself, including a consultation with his pulmonologist. During the nine months of pretrial release, Mr. Cardiff has consistently complied with all court orders and has previously traveled both domestically and internationally with court approval without incident. His record reflects no violations, demonstrating his commitment to adhering to all conditions of his release. Mr. Cardiff will return to Texas as scheduled and will maintain regular contact with his Pretrial Officer, Jack Sherrod, while traveling. Additionally, Mr. Cardiff will supply Mr. Sherrod and Pretrial Services with a full travel itinerary prior to his departure.

Mr. Cardiff proposes that he travel to Ireland on September 9th, 2024, and return to Texas on September 25th, 2024. with the travel duration not to exceed 14

1 nights out of the country, and for the return of his passport to facilitate this travel.
2 Additionally, it is requested that Mr. Cardiff's curfew be lifted, and the electronic
3 monitoring devices be removed during the period of travel.

4 Sureties Lilia Murphy and Brian Kennedy do not oppose this request.

5 United States Probation Officer Joe Torres was contacted on September 3,
6 2024 and does not oppose this request.

7 DOJ Manu Sebastian, in response to Defendants' request for concurrence,
8 simply stated: "The Government opposes this request."
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10 Dated: September 3, 2024
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12 By: /s/ Stephen R. Cochell

13 Stephen R. Cochell

14 Attorney for Defendant

15 JASON EDWARD THOMAS CARDIFF
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